

May 7, 2001

MEMORANDUM TO: Patrick W. Baranowsky, Chief
Operating Experience Risk Analysis Branch
Division of Risk Analysis & Applications
Office of Nuclear Regulatory Research

FROM: Hossein G. Hamzehee
Operating Experience Risk Analysis Branch
Division of Risk Analysis & Applications
Office of Nuclear Regulatory Research

SUBJECT: SUMMARY OF APRIL 24, 2001 PUBLIC MEETING ON DRAFT
PHASE-1 RISK-BASED PERFORMANCE INDICATOR
DEVELOPMENT REPORT

A public meeting was held on Tuesday, April 24, 2001, in Rockville, Maryland to discuss comments from external stakeholders on the draft Phase-1 RBPI development report. Representatives from the Nuclear Energy Institute (NEI), Institute of Nuclear Power Operations (INPO), and the NRC attended the meeting. The list of attendees is presented in Attachment 1, and the meeting agenda is provided in Attachment 2.

The presenters included the NRC staff from the Office of Nuclear Regulatory Research (RES) and the Office of Nuclear Reactor Regulation (NRR), and NEI. The objectives of this meeting were to:

- Provide perspective on relationship of RBPIs to the Reactor Oversight Process (ROP)
- Present a summary of RBPI development process and results
- Discuss alternative approaches for developing RBPIs in response to stakeholders concern over the total number of RBPIs
- Discuss specific areas for review
- Discuss public review comments and answer questions

Key issues and comments from industry representatives discussed at the meeting were:

- RBPIs are “the right way to go” in a risk-informed regulation process. The RBPI program is “ahead of its time” with respect to the current regulatory environment.
- Industry supports more risk-informed, performance based initiatives such as RBPIs. However, the following issues need to be addressed before RBPIs can be implemented:
 - Impact of additional RBPIs on the Action Matrix
 - Appropriate reduction in inspection activities if additional RBPIs are used

- Any change or addition to the existing performance indicators must add value to inspection, assessment, and enforcement process
- Industry expressed concerns about moving forward with additional NRC risk-informed initiatives, including the RBPI program, without consideration of a more integrated agency-wide approach that includes:
 - Resolution of conflicts between risk-informed and deterministic mind-sets within the NRC staff.
 - Resolving the use of design/licensing-basis versus risk-based approaches.
 - Obtaining consistency among performance thresholds in various NRC programs, such as Maintenance Rule, WANO, ROP, and RBPIs.
 - Establishing a common understanding of definitions (such as unavailability and unreliability definitions) across various regulatory programs.
 - Resolving the issue of additional burden associated with data gathering and reporting under 50.9 requirements, which they view as excessive and unnecessary to support ROP needs.
- The industry representatives indicated that the development of RBPIs at the functional level seems to be appropriate and may be better than the current RBPIs. Functional level RBPIs will also result in a fewer number of performance indicators.
- It was indicated that some of the RBPIs may have unintended consequences (e.g., some plants may cut back on maintenance activities in order to keep equipment unavailabilities below their performance thresholds).
- The industry representatives indicated that shutdown RBPIs may be more appropriate for the Significance Determination Process (SDP). Industry is concerned that setting thresholds for shutdown indicators will create defacto requirements.
- RBPIs for “component classes, such as motor-driven pumps, motor-operated valves, and air-operated valves”, were not recommended by the industry. The extent of condition of these components can be addressed by the licensee Corrective Action Program, and the SDP addresses cross-cutting issues.

Attachments:

1. List of Attendees
2. Agenda

MEMORANDUM DATED: 5/7/01

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Template RES-006 Accession Number ML011280407 RES File Code 2C-3

PUBLIC MEETING ON DRAFT PHASE-1 RBPI DEVELOPMENT REPORT**LIST OF ATTENDEES**

<u>NAME</u>	<u>ORG</u>	<u>E-MAIL</u>
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Hossein Hamzehee	NRC	hgh@nrc.gov

PUBLIC MEETING ON DRAFT PHASE-1RBPI DEVELOPMENT REPORT

MEETING AGENDA

8:30am - 8:40am:	Introduction	Steve Mays (RES)
8:40am - 9:00am:	Relationship of RBPIs to the Reactor Oversight Process	Tom Boyce (NRR))
9:00am - 10:00am:	Presentation of Phase 1 Results and Review Process	Steve Mays (RES)
10:00am - 10:15am:	Break	
10:15am - 12:15pm:	Discussion of public comments/Questions	Steve Floyd (NEI)
12:15pm - 12:30pm:	Wrap-up	Steve Mays (RES)

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2. S. Mays - Concur						
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